

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:	Chapter 7
William Richard Fischer,	Case: 12-42128 -RJK
Debtor	

Suzanne D. Jackson,	Adv. Case No. 12-04183
Plaintiff,	
v.	
William Richard Fischer,	
Defendant.	

JOINT STIPULATION TO AMEND ORDER FOR TRIAL

Plaintiff Suzanne D. Jackson and defendant William Richard Fischer, hereby stipulate to the following:

1. Ms. Jackson and Mr. Fischer, agree that the Court's August 13, 2013, Third Amended Order for Trial (the "Order for Trial") should be modified.
2. On September 19, 2013, Jon R. Sabes and Steven Sabes, filed a Motion to Intervene in this adversary proceeding, with a hearing date set for October 3, 2013. [Docket No. 41.]
3. Due to an already scheduled surgery, counsel for Ms. Jackson cannot attend the hearing on October 3, 2013, and, despite numerous communications, counsel for Ms. Jackson has been unable to reach an agreement with counsel for Messrs. Sabes to reschedule the hearing on the Motion to Intervene to a later, mutually convenient date.
4. In order to address counsel for Messrs. Sabes' concerns regarding moving the hearing date closer to the current trial date, to allow the parties to seek a later hearing date on the

Motion to Intervene, and to avoid burdening the court with having to resolve these scheduling issues, counsel for Ms. Jackson and counsel for Mr. Fischer have agreed to modify the trial date.

5. For these reasons, counsel for Ms. Jackson and counsel for Mr. Fischer respectfully request that the Court reschedule the trial date, currently set for December 9, 2013, to a date at the Court's convenience during the January 2014 or February 2014.

6. Counsel for Ms. Jackson and counsel for Mr. Fischer are continuing to pursue discovery but do not contemplate any change in the number of days needed for trial.

7. The parties respectfully request that, once the Court has established the revised date for trial, that all other dates and deadlines in the Order for Trial be modified accordingly, including the deadline to confer and enter into stipulations as required in paragraph 2 of the Order for Trial.

8. Rescheduling the above dates will resolve the issues identified above, and is requested in consideration and respect of the Court's time and resources.

[Signature page follows]

In accordance with Local Rule 9011-4(f), the non-filing party authorizes the filer to submit this document with his electronic signature.

Dated: September 23, 2013

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Dated: September 23, 2013

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